

**STATE OF SOUTH CAROLINA**  
**BEFORE THE PUBLIC SERVICE COMMISSION**  
**DOCKET NO. 2019-290-WS**

IN RE:	)	
	)	
APPLICATION OF BLUE GRANITE	)	<b>CONSUMER ADVOCATE’S FIRST SET OF INTERROGATORIES TO BLUE GRANITE WATER COMPANY</b>
WATER COMPANY FOR APPROVAL	)	
TO ADJUST THE RATE SCHEDULE	)	
AND INCREASE RATES	)	
	)	

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Pursuant to S.C. Code Ann. Regs. 103-833(C), the Consumer Advocate, by and through its undersigned counsel, hereby submits this First Set of Interrogatories to Blue Granite Water Company (the “Company”). Pursuant to South Carolina Rule of Civil Procedure 26(e), each interrogatory is continuing until the time of the hearing such that Blue Granite Water Company must promptly transmit to the Consumer Advocate the requested information as it becomes available. Please forward to the undersigned, via email, your first iteration of responses to the following request on or before Tuesday, February 11, 2020:

- 1-1 Please provide the names and addresses of any expert witnesses whom Blue Granite Water Company intends to use as a witness at the hearing in this case and identify with specificity the issues to be addressed by such witnesses.
  
- 1-2 Please identify with specificity any responses to discovery, filings, or other information provided by the Consumer Advocate or another party that Blue Granite Water Company will rely upon in proposing each modification or adjustment identified in the application, and describe the basis for such reliance. Pursuant to South Carolina Rule of Civil Procedure 26(e), this interrogatory is continuing until the time of the hearing such that Blue Granite Water Company must promptly transmit to the Consumer Advocate the requested information as it becomes available.

- 1-3 Please identify and describe in detail any support—including, but not limited to, statutes, caselaw, Commission orders, or other authorities—that Blue Granite will rely upon in proposing each modification or adjustment identified in response to Interrogatory 1-2. Pursuant to South Carolina Rule of Civil Procedure 26(e), this interrogatory is continuing until the time of the hearing such that Blue Granite Water Company must promptly transmit to the Consumer Advocate the requested information as it becomes available.
- 1-4 Please explain the history and basis for the establishment of two different water service territories and the basis for charging each service territory different rates. Additionally, please explain why the two sewer service territories are not assessed different rates.
- 1-5 Please explain the basis for increasing the rates in each water service territory by a different percentage.
- 1-6 Referencing Exhibit A of the Company's filing, pages 1 and 3:
- a. For water distribution only customers, please explain how the separate distribution charges and purchased water charges were determined; and
  - b. Please explain why the commodity charge for water supply only customers is not equal to the sum of the distribution charge and purchased water charge of distribution only customers, as is the case for the separate sewer collection/treatment and treatment only customers.
- 1-7 Please explain why the proposed purchased water charge for each water service territory differs significantly.
- 1-8 Please explain why the Company does not charge for sewer service based on the water consumption of customers.
- 1-9 Referencing Exhibit A of the Company's filing, page 8:
- a. Please explain how the separate collection charge and treatment charge rates were determined for sewer service; and

- b. Please explain the difference between the \$47.10 and \$52.71 per SFE collection charges. That is, when is the \$47.10 charge assessed and when is the \$52.71 charge assessed?
- 1-10 Please explain how frequently the meters of water customers are read.
- 1-11 Please explain how the Company can determine whether a water customer is served exclusively from a well owned by the Company or purchased from another agency or entity. Additionally, please explain if any customers are served by a mix of Company and third-party water.
- 1-12 Please explain how the Company can determine whether customers' wastewater is treated by the Company's facilities or another agency or entity. Additionally, please explain if any customers received treatment service from a mix of Company and third-party facilities.
- 1-13 Please identify the extent to which current water and sewer customers are not both customers of the Company. That is, they take one service from the Company but not the other (excluding customers who may be supplied water by an agency or entity other than the Company, or are provided sewer treatment service from an agency or entity other than the Company.)
- 1-14 Referencing page 35, lines 7 through 22, of Mr. DeStefano's Direct Testimony:
- a. If the Company is proposing to spread third-party charges across service territories (e.g., water service Territories 1 and 2), rather than just those customers connected to a third-party supplier, why are separate rates proposed for water supply only customers and water distribution only customers, and similarly, sewer collection/treatment only and collection only customers?
  - b. Given the description in subpart (a), why would water supply only and sewer collection/treatment only customers not also be subject to the rate adjustment mechanisms; and
  - c. Is it the Company's intention to eventually adopt a unified set of rates for water service in Territories 1 and 2 for supply only and distribution only customers? Please explain.

Consumer Advocate

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